

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ECF CASE
08 CV 3444 (GEL)

NIPPON YUSEN KAISHA a.k.a. NYK LINE,

Plaintiff,

- against -

McDONOUGH INDUSTRIES LLC a.k.a.
McDONOUGH INDUSTRIES LLC USA and
LAWRENCE McDONOUGH.,

Defendants.

VERIFIED COMPLAINT IN
ADMIRALTY

Plaintiff, by its attorneys, Cichanowicz Callan Keane Vengrow & Textor, LLP, for its complaint, alleges on information and belief:

GENERAL ALLEGATIONS

1. The jurisdiction of this Court is based upon:
 - (a) The admiralty and maritime nature of the claims within the meaning of 28 U.S.C. 1333(1) and F.R.Civ.P. 9(h);
 - (b) Diversity of citizenship within the meaning of 28 U.S.C. 1332(a)(2); and
 - (b) Supplemental jurisdiction within the meaning of 28 U.S.C. 1367.
2. Plaintiff is a corporation organized and existing under the laws of Japan.
3. Defendant, McDONOUGH INDUSTRIES, LLC, is a limited liability company formed and existing under the laws of one of the fifty U.S. states with its office and principal place of business in Boston, Massachusetts.

4. Defendant, LAWRENCE McDONOUGH, was at all relevant times, and still is, a citizen and resident of Massachusetts, and the owner and chief executive officer of defendant, McDONOUGH INDUSTRIES, LLC.

5. Defendants were the booking parties, shippers, consignors and billing parties of certain cargo shipping containers, said to contain waste paper, which were loaded and carried by plaintiff by sea pursuant to various bill of lading contracts of carriage from New York to Hong Kong. A breakdown of each such shipment is attached hereto as SCHEDULE A.

COUNT 1
McDONOUGH INDUSTRIES, LLC - BREACH OF CONTRACT

6. Pursuant to said bill of lading contract(s) of carriage, there is now due and owing to plaintiff from defendant, McDONOUGH INDUSTRIES, LLC, ocean freight, demurrage, storage, detention and other charges for the shipments identified in SCHEDULE A as follows (“HK\$” meaning Hong Kong Dollars):

Prepaid Ocean Freight Charges:	US\$	137,902.00
Collect Ocean Freight Charges:	HK\$	457,325.00
Other Charges: (Shifting Charges to Off Dock Depot and Storage Cost at Depot)	HK\$	2,423,980.00

7. At the rate of exchange in effect on February 26, 2008, the amounts in the foregoing paragraph given in Hong Kong Dollars would convert to the following amounts in U.S. Dollars:

Prepaid Ocean Freight Charges:	US\$	137,902.00
Collect Ocean Freight Charges:	US\$	58,683.02
Other Charges: (Shifting Charges to Off Dock Depot and Storage Cost at Depot)	US\$	<u>311,043.10</u>
TOTAL:	US\$	507,628.12

No part of the foregoing has been paid although duly demanded.

8. All conditions precedent have been performed or have occurred.

COUNT 2

LAWRENCE McDONOUGH – PIERCING VEIL - BREACH OF CONTRACT

9. Defendant, LAWRENCE McDONOUGH, booked or caused to be booked in the name of defendant, McDONOUGH INDUSTRIES, LLC, with plaintiff, the shipments identified in the attached SCHEDULE A.

10. At booking, defendant, LAWRENCE McDONOUGH, declared or caused the cargoes to be declared to plaintiff to be waste paper when in fact the cargoes did not qualify as waste paper under the applicable contracts and/or law.

11. Defendant, LAWRENCE McDONOUGH, knew the falsity of the declaration as to the nature and character of the cargoes when made, but acted with the intent to defraud both plaintiff and various consignees in Hong Kong.

12. As a result of the false declarations, the cargoes were rejected by the Hong Kong consignees.

13. As a result of the fraudulent conduct of defendant, LAWRENCE McDONOUGH, any separate legal existence between him and codefendant, McDONOUGH INDUSTRIES, LLC,

should be disregarded, and defendant, LAWRENCE McDONOUGH, should be held personally liable on the bills of lading contracts identified in SCHEDULE A although the same were nominally entered into on behalf of defendant, McDONOUGH INDUSTRIES, LLC.

COUNT 3
BOTH DEFENDANTS – COMMON LAW AND/OR MARITIME FRAUD

14. The matters alleged in paras, 1 – 11, supra, constitute common law or maritime fraud within the meaning of F.R.Civ.P. 9(b).

COUNT 4
BOTH DEFENDANTS – FUTURE DAMAGES

15. By virtue of the matters alleged in paras. 1 – 12, supra, plaintiff will continue to accrue future damages in the form of (a) continuing demurrage, storage and detention charges, (b) freight charges to return the containers and cargoes to the U.S., and (3) approximately \$55,000.00 in charges for disposition of the cargoes.

16. As best as can now be estimated, those damages will amount to US\$300,000.00.

WHEREFORE, plaintiff respectfully requests relief as follows:

(a) That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction issue against the defendants, citing them to appear and answer under oath all and singular the matters alleged.

(b) That since the defendants cannot be found within the district pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules and the United States Arbitration Act, 9 U.S.C.

§§ 1 and 8, attaching all tangible or intangible property in whatever form or any other funds held by any garnishees to be named in the process up to the amount of \$1,300,000.00 which represents plaintiff's good faith estimate of the principal amount incurred and to be incurred, prejudgment interest, attorneys' fees, costs and disbursements sued for to secure the plaintiff's claim, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged;

(c) That plaintiff have judgment for the amount of its claim together with punitive damages, interest, and the costs and disbursements of this action.

Dated: New York, NY, March 31, 2008

CICHANOWICZ, CALLAN, KEANE,

VENGROW & TEXTOR, LLP
Attorneys for Plaintiff

By: Joseph De May, Jr.
Joseph De May, Jr. [JD-9105]
61 Broadway, Suite 3000
New York, New York 10006-2802
(212)344-7042

ATTORNEY VERIFICATION

The undersigned declares that the following statement is true under the penalties of perjury:

1. I am over 18 years of age, of sound mind, capable of making this verification and fully competent to testify to all matters stated herein.
2. I am attorney for the plaintiff in this action and I am fully authorized to make this verification on its behalf.
3. I have read the foregoing complaint, and the contents thereof are true and accurate to the best of my knowledge upon information and belief.
4. The reason that this verification was made by me and not the plaintiff is that the plaintiff is a corporation, none of whose officers are present in the district.
5. The source of my knowledge is information and records furnished to me by the plaintiff and its underwriters, all of which I believe to be true and accurate.

Dated: New York, New York

March 31, 2008

Joseph De May, Jr.

Joseph De May, Jr. [JD-9105]

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VSL/VOY(BL)	B/L	Booking No.	BL Date	VSL/VOY	ETA (MM/DD/YY)	Load Port	Discharge Port	Place of Delivery	SHIPPER	CNEE	Commodity	CNTR NO	SIZE	TYPE
OOCL NEW YORK V.066	358095664	CHIF8818	4/10/2007	ASIAN GYRO V.035N	08/05/07	NEW YORK	SINGAPORE	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	SOFT MIXED PAPER	FSCU9970592	40	HCD
OOCL NEW YORK V.066	358095664	CHIF8818	4/10/2007	ASIAN GYRO V.035N	08/05/07	NEW YORK	SINGAPORE	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	SOFT MIXED PAPER	NYKU5910044	40	HCD
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OOCL NEW YORK V.066	358095664	CHIF8818	4/10/2007	ASIAN GYRO V.035N	08/05/07	NEW YORK	SINGAPORE	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	SOFT MIXED PAPER	TRLU7013497	40	HCD
BREMEN EXRESS V.34	360012435	CHII5258	7/28/2007	BREMEN EXPRESS V.34W28	08/27/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU6666734	40	HCD
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BREMEN EXRESS V.34	360012435	CHII5258	7/28/2007	BREMEN EXPRESS V.34W28	08/27/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	TRLU8182953	40	HCD

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BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU6665785	40	HCD
BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU9184989	40	HCD
BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU9715051	40	HCD
BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5467147	40	HCD
BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5494040	40	HCD
BELLAVIA V.09	360014153	CHII7369	8/2/2007	BELLAVIA V.09W31	09/03/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5726166	40	HCD
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OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5573766	40	HCD

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VSL/VOY(BL)	B/L	Booking No.	BL Date	VSL/VOY	ETA (MM/DD/YY)	Load Port	Discharge Port	Place of Delivery	SHIPPER	CNEE	Commodity	CNTR NO	SIZE	TYPE
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5586104	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5627796	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5786102	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5798607	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5813527	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5848312	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	NYKU5967630	40	HCD
OCTAVIA V.09	360018898	CHIJ2908	8/16/2007	OCTAVIA V.09W33	09/17/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	WASTE PAPER	TCNU9060536	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU6661265	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	FSCU9181402	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5578937	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5660670	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5686192	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5719249	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5736550	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5867523	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5895757	40	HCD
HOECHST EXPRESS V.91	360018901	CHIJ3190	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU6974423	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU4026759	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU4029594	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU4115985	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5620575	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5657825	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5805394	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5857340	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	NYKU5871776	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	TCNU9844184	40	HCD
HOECHST EXPRESS V.91	360018903	CHIJ3191	8/23/2007	HOECHST EXPRESS V.91W34	09/24/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP.	WASTE PAPER	TRLU7017450	40	HCD
ROTTERDAM EXPRESS V.54	360021539	CHIJ4705	9/1/2007	ROTTERDAM EXPRESS V.54W35	10/07/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	MIXED WASTE PAPER NO. 3D GRADE	FSCU9961100	40	HCD
ROTTERDAM EXPRESS V.54	360021539	CHIJ4705	9/1/2007	ROTTERDAM EXPRESS V.54W35	10/07/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	MIXED WASTE PAPER NO. 3D GRADE	NYKU4116596	40	HCD
ROTTERDAM EXPRESS V.54	360021539	CHIJ4705	9/1/2007	ROTTERDAM EXPRESS V.54W35	10/07/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	YURI INVESTMENT & TRADING CORP	MIXED WASTE PAPER NO. 3D GRADE	NYKU4116786	40	HCD

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VSL/VOY(BL)	B/L	Booking No.	BL Date	VSL/VOY	ETA (MM/DD/YY)	Load Port	Discharge Port	Place of Delivery	SHIPPER	CNEE	Commodity	CNTR NO	SIZE	TYPE
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU4133952	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5413069	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5418986	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5460564	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5597270	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5609370	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5721483	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5721903	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5738758	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5744452	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5745382	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5766620	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5891026	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU5950520	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	NYKU6212161	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	TRLU5652652	40	HCD
VANCOUVER EXPRESS V.17	360021447	CHIJ6545	9/7/2007	VANCOUVER EXPRESS V.17W36	10/10/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	ON KEE (HK) ENVIRONMENTAL RECYCLING LIMITED	MIXED WASTE PAPER NO. 3D GRADE	TRLU7011473	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	GATU8523054	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4034409	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4041603	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4045424	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4082285	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4082460	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4099117	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4109405	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU4133994	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5404827	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5450313	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5477248	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5505735	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5580997	40	HCD

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DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5595533	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5597520	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5620467	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5623785	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5656412	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5883843	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	NYKU5977351	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	TCNU9362177	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	TGHU8564494	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	TRLU5882193	40	HCD
DUESSELDORF EXPRESS V.51	360024005	CHIJ7514	9/13/2007	DUESSELDORF EXPRESS V.51W37	10/14/07	NEW YORK	HONG KONG	HONG KONG	MCDONOUGH INDUSTRIES	KIM CHINH JOINT STOCK COMPANY	MIXED WASTE PAPER B GRADE	TRLU7015376	40	HCD